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July 1, 2024

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via ECF

**Honorable Judge Jennifer L. Rochon
United States District Court
Southern District of New York
500 Pearl Street, Room 1920
New York, New York 10007**

**RE: *Square One Choices Inc. v. Yiwu Bingwen Trading Co., Ltd*
USDC SDNY Case No. 1:24-cv-02766**

Dear Judge Rochon:

I am writing on behalf of Plaintiff Square One Choices Inc. ("Square One") regarding the Pretrial Conference set by the Court for July 10, 2024 (*see* Dkt. No. 4). By this letter-motion, Plaintiff Square One seeks to reschedule the Pretrial Conference until Square One has an opportunity to serve Defendant.

Plaintiff and Defendant have previously been in communication via email in an effort to amicably resolve this dispute. Once the negotiations broke down, Square One filed the Complaint on April 11, 2024. On April 14, 2024, Square One sent to Defendant "Notice of a Lawsuit and Request to Waive Service of Summons" and "Waiver of Service of Summons" documents, including the Complaint and Exhibits and requested to waive service. After several follow up communications, on June 12, Defendant informed Plaintiff's counsel of refusal to waive service. In addition, Defendant informed Plaintiff's counsel that the party that engaged in sale of the infringing products is different than the one named in the Complaint and provided the corrected name and address of Defendant. On June 21, 2024, Plaintiff filed the Amended Complaint naming the proper Defendant, namely, Yiwu Bingwen Trading Co., Ltd.

Hon. Judge Jennifer L. Rochon

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Square One intends to submit a motion for leave to effect service of the Summons and Complaint by alternative means or, alternatively, serve Defendant under the Hague Service Convention. Hence, Plaintiff requests that the Pretrial Conference is moved either thirty (30) days after an Answer is filed in this case or six (6) months, whichever date comes first.

Thank you in advance for your time and consideration.

Very truly yours,

MUNCY, GEISSLER, OLDS & LOWE, P.C.



Leo V. Gureff
(SDNY Bar No.: LG1271)

LVG/

The request is GRANTED. The initial pre-trial conference is adjourned from July 10, 2024 to January 8, 2025 at 11:00 a.m. Should Defendant respond to the First Amended Complaint before that conference, the Court will hold the conference sooner.

Dated: July 2, 2024
New York, New York

SO ORDERED.



JENNIFER L. ROCHON
United States District Judge